EXHIBIT D

in the united states bankrupicy court for the district of delaware

Chapter 11	
Casp No. 01-01139 (JE	F)
(Tolotly Administered)	
Docket No.	
	Case No. 01-01139 (JE) (Johnly Administered)

STIPULATION REGARDING EXPERT DISCOVERY

2. Simultaneous with the service of all expert reports, and except as provided in paragraph 2 below, the parties shall produce the specific documents, data, and written information that the expert directly railed upon in forming his or her expert opinions in this matter. To the extent that the direction of a disclosed excitation, or data processed or modeled by computer at the direction of a disclosed expert in the course of forming the expert's opinious, smachine readable topies of ruch exhibits, information, or data shall be produced. To the extent that the supert relies on documents, data, or written information that already has been produced to the pantles in the bankruptcy, a listing of all such documents, data or written information shall be sufficient, provided, however, that as to document relied upon by any expert of the Libby Claimants that are governed by the Order Authorizing Discovery from Dr. Alan C. Whitehouse and Cartifying Issues of Patient Privacy for Judge Donald W. Moltoy extered June 5, 2006 (the "Whitehouse Order"), (a) disclosure and copying of such records aball continue to be governed by the Whitehouse Order, provided that production of medical records of the 409 Libby Claimants and sunong the 550 Whitehouse Database Patients (as those learns are used in the Whitehouse Order) shall take place on a

rolling basis commencing when the CARD Clinic in Libby, Montana, receives payment of in outspecting invoice to Grace, shall be substantially completed within 30 days after such receipt of proment, and shall be fully completed shortly thereafter, and (b) it shall be sufficient for such expert's report to state that the report relies on the medical records of the Libby Claimants and the 550 Whitehouse Database Patients. To the extent that the expert rolles on articles published to a publicly available journal or similar publication, a listing of all such articles relied upon shall be sufficient; provided, however, that if a party who proffers the report of an expert is notified that another party has been unable to obtain one or more of the articles or other documents called upon, the party proficting the expert shall provide copies of any such exticle or other document within 5 days of such a request. The provisions of this paragraph apply to Rust Consulting and to any work performed by it in compiling the Questionnaire responses loto a navigable database. Debions will produce a representative or representatives from Rust Counding for a deposition by the parties conducted pursuant to Fed. R. Civ. P. 30(b)(6), consistent with paragraph 2 of this Hispatation. Rothing in this stipulation shall be construed to require experts to reproduce materials that they rely upon which keps already been produced to the parties during the course of the bankroptcy estimation. proceedings.

2. The following estegories of date, information, or documents used not be disclosed by any party, and are outside the scope of permissible discovery (including deposition questions): (i) any notes or other writings taken or prepared by or for an expert winness in connection with this matter, including correspondence or memos to or from, and notes of convertations with, the expert's stricture and/or clarked or support staff, one or more

other expert witnesses or non-trainiving expert consultants, or one or more attorneys for the party offering the testimony of such expert witness, unless the expert witness is relying upon those soies or other writings in commercion with the expert witness's cylnions in this matter; (ii) draft reports, draft studies by draft work papers, preliminary or intermediate calculations, computations or data true, or the other preliminary, intermediate or draft materials prepared by or at the direction of the expert witness; (iii) any ord or written computation between an expert witness and the expert's assistant and/or clerical or support stuff, one or mans other expert witnesses or non-testifying expert consultants, as one or more attorneys for the party offering the testimony of such expert witness, unless the expert witness is relying upon the communication in connection with the expert witness's epinions in this matter; (iv) the confidential information displaced to the expert in a prior engagement by another effects or early. Pinally, to the extent that the expert in a prior engagement by another effects under Ped. R. Civ. P. 25(a)(2)(E) or (C), the parties agree to such waiver.

Respectfully submitted,

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